

REMARKS

Applicants would like to thank Examiner for the indicated allowability of claims 9-14 and 21-24 and of the subject matter in claims 2-6, 16-18, 20 and 27-28. Applicants respectfully request reconsideration and allowance of all remaining claims in view of the above-amendments and following remarks.

I. CLAIM OBJECTIONS

Claims 2-8, 11-14, 16-18, 20, 23-24 and 26-28 were objected to for minor informalities. Specifically, the Examiner requested that numerous commas be replaced with semicolons. Although Applicants believe the present use of commas is grammatically correct and perfectly allowable under the Patent Office Rules, these claims have been amended as suggested in the Office Action to meet with the Examiner's preferences. These amendments are not made in view of any prior art reference or rejection and do not affect the scope of the claims. With these amendments, Applicants respectfully requests that the objection to these claims be withdrawn.

II. CLAIM REJECTIONS UNDER §102

Claims 1, 7-8, 15, 19, 25 and 26 were rejected under §102(e) as being anticipated by Filseth et al., U.S. Patent No. 6,611,953, which is assigned to the same assignee as the present application.

A. **Independent Claim 1**

With respect to claim 1, the Filseth '953 patent does not disclose at least elements b), d) and f). Although the present application and the Filseth '953 patent involve partitioning features into regions and measuring distances from the midpoints of the features, there are significant differences between the two inventions.

An essential distinction between the Filseth '953 patent and claim 1 of the present application is that the

distances measured from the midpoint of each region in the '953 patent are distances to other points along the boundaries of the mask features, not the distances to locations of the process light intensity as they are in claim 1 of the present application.

Furthermore, the measurements in the '953 patent from the region midpoints are not made in a direction normal to the boundary, as required by element d) in claim 1, but are instead made in the direction in which their destination points lie.

The Filseth '953 patent does not compute the process light intensity location, as required by element b) in the present application. Consequently, the Filseth '953 patent does not compute the distance to it, as required by element d). As a result, the region movement distance in the Filseth '953 patent is not based on the same distance that is calculated in element d) and by which the region is moved in element f) in claim 1 of the present application. Since the Filseth '953 patent does not teach all of the elements in claim 1, Applicants respectfully request that the rejection of claim 1 and its dependent claims 7-8 based on the Filseth '953 patent be withdrawn.

B. Dependent Claims 7 and 8

Claims 7 and 8 refer to, "calculating a diffusion shift of a photoresist." Claims 7 and 8 therefore concern compensation for the effects of photoresist diffusion. The Filseth '953 patent does not consider diffusion. Rather, the Filseth '953 patent relates to the effects of light diffraction. It is possible that the term "diffusion" was confused with "diffraction", which is the primary focus of optical proximity correctors in general.

Since the Filseth '953 patent is not related to diffusion of a photoresist, the Filseth '953 patent does not anticipate the elements of claims 7 and 8. Applicants

respectfully request that the rejection of these claims under §102(e) be withdrawn.

C. Independent Claims 15 and 25 and dependent Claim 26

Similar to claims 7 and 8, independent claims 15 and 25 and dependent claim 26 relate to diffusion of a photoresist. Therefore, these claims are also patentable over the Filseth '953 patent for the same reasons as were discussed above with respect to claims 7 and 8.

D. Independent Claim 19

Independent claim 19 is directed to a computer useable medium and has similar limitations as independent claim 1, which are not disclosed by the Filseth '953 patent. Therefore, independent claim 19 is patentable for the same reasons as were discussed above with respect to independent claim 1.

The Director is authorized to charge any fee deficiency required by this paper or credit any overpayment to Deposit Account No. 23-1123.

Respectfully submitted,

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